



WEPOWER Eco Corp.  
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Friday, April 24, 2015

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, N.W.  
Washington, DC 20554, USA

Re: IB Docket No. 13-213

Dear Ms. Dortch:

WEPOWER Eco Corp. ("WEPOWER") offers this letter of support regarding the Commission's proposed rules to expand the uses of the 2473-2495 MHz band. WEPOWER is a U.S. Energy Service Company (ESCO) based in Los Angeles. The company offers renewable energy production and energy efficiency products and services including wind-powered turbines, solar-powered systems, hybrid solar PV and wind-powered systems, green roofs, smart lighting controls, LED / HID lighting, intelligent skylights systems, battery storage systems, energy and power control management and monitoring systems, among other offerings. As we modernize our commercial and consumer offerings, we continue to link our products to data connections and wireless spectrum is a fundamental growth driver to our future growth.

WEPOWER's lighting systems, and control and monitoring systems rely upon 2.4 GHz to provide high quality services to our customers. Wi-Fi is critical to our business and, as such, we have followed the Commission's proposed rules regarding terrestrial service in the 2.4 GHz band which provides for greater flexibility for terrestrial use of 2483.5-2495 MHz combined with Part 15 rules that would allow Globalstar's TLPS service to use the unlicensed spectrum at 2473-2483.5 MHz.

We commend the Commission's continued initiatives to free up much needed spectrum to meet the communications industry's connectivity demands. These demands are primarily driven by increased consumer desire for higher speeds, higher quality connectivity and more advanced mobile applications with increased throughput requirements. We are unfortunately subject to the laws of physics and a limited amount of useable spectrum. Absent a near miracle technical breakthrough to increase spectral efficiency, spectrum demand will outstrip supply. In telecom, we believe that desirable bands, if available for terrestrial broadband, will be used for economically productive communications and we urge the Commission to continue the bold initiatives to unlock underutilized spectrum for terrestrial broadband. While the TLPS rules alone do not solve this growing problem, TLPS represents a significant step in the continuation of plans outlined in the 2010 National Broadband Plan. WEPOWER welcomes increased innovation which will bring increased competition in the wireless space – all for the benefit of American consumers and our country's economic competitiveness.

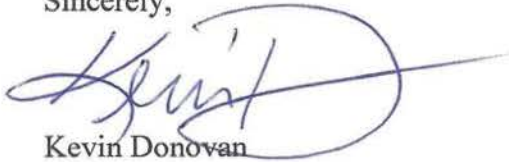
The Globalstar TLPS solution leverages the most ubiquitous wireless standard on the planet to firms like WEPOWER that demand high quality connectivity. TLPS provides a valuable solution

for consumers and commercial organizations and uniquely offers the benefits of a managed solution in 2.4 GHz. We believe this is an interesting complement to our uses of 5 GHz unlicensed spectrum with favorable characteristics related to range and signal attenuation with favorable SNR potential and managed benefits when we compare TLPS to other 2.4 GHz channels.

We look forward to being able to have the opportunity to embed TLPS into our mission critical products and services that, as with all companies that don't have access to licensed spectrum, are exposed to quality control issues given the prevalence of uncoordinated activity in the other 2.4 GHz channels which has created a volatile noise floor that is only increasing. TLPS has the potential to be used in smart power grid performance monitoring and control, personnel safety systems that enable real-time, voice, data and video connectivity and our large scale LED lighting solutions which require wireless connectivity for Smart-Home applications – these applications and the consumer experience will be materially improved using TLPS. WEPOWER clients expect five-nine network reliability and support from us and TLPS provides the foundation for us to deploy leading edge products and services.

We have followed the TLPS proceeding for over two years and believe that the record is complete and the technical concerns raised by opposition parties have been appropriately addressed. Simply stated, we view TLPS as providing much needed spectrum while not impacting existing services and therefore strongly encourage the FCC to move forward to finalize its proposed rules which will drive innovation and provide quality consumer benefits.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kevin Donovan', with a large, stylized circular flourish extending from the end of the signature.

Kevin Donovan  
Chairman & CEO  
WEPOWER Eco Corp.